# Exhibit 1

# **Proposed Order**

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

In re	) ) Chapter 9
CITY OF DETROIT, MICHIGAN,	) ) Case No. 13-53846
Debtor.	) ) Hon. Steven W. Rhodes )

# ORDER GRANTING MOTION IN LIMINE BARRING THE CITY FROM INTRODUCING COMMUNICATIONS PROTECTED BY THE COURT'S MEDIATION ORDER

This matter having come before the Court on Syncora's Motion *in Limine*Barring the City from Introducing Communications Protected by the Court's Mediation Order (the "Motion"), the Court having reviewed Syncora's Motion, and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

#### IT IS HEREBY ORDERED THAT:

- 1. Syncora's Motion is GRANTED.
- 2. The City is barred from introducing evidence of communications covered by the Mediation Order.
- 3. Syncora is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
- 4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

### IT IS SO ORDERED.